

BRENT M. RESH  
(Nevada Bar No. 14940)  
BRENT RESH LAW, PLLC  
2401 La Solana Way  
Las Vegas, NV 89102  
(702) 781-6903  
brent@brentreshlaw.com

JESSICA L. BLOME  
(California Bar No. 314898, admitted pro hac vice)  
J. RAE LOVKO  
(California Bar No. 208855, admitted pro hac vice)  
GREENFIRE LAW, PC  
2748 Adeline Street, Suite A  
Berkeley, CA 94703  
(510) 900-9502  
jblome@greenfirelaw.com  
rlovko@greenfirelaw.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAURA LEIGH, individually, and WILD  
HORSE EDUCATION, a non-profit  
corporation,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
INTERIOR, BUREAU OF LAND  
MANAGEMENT, TRACY STONE-  
MANNING, Director of the Bureau of Land  
Management, and JON RABY, Nevada State  
Director of the Bureau of Land Management,

*Federal Defendants.*

CASE NO. 3:23-cv-00568-ART-CSD

**DECLARATION OF J. RAE LOVKO IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR JUDICIAL NOTICE**

1 I, J. Rae Lovko, declare that if called as a witness in this action I would competently  
2 testify of my own personal knowledge, as follows:

3 1. I am an attorney with Greenfire Law, PC, counsel for Plaintiffs in the above-titled  
4 action.

5 2. Attached hereto as Exhibit A is a true and correct copy of excerpts from Merriam  
6 Webster's online dictionary. I downloaded these excerpts from [https://www.merriam-](https://www.merriam-webster.com/dictionary/constraint)  
7 [webster.com/dictionary/constraint](https://www.merriam-webster.com/dictionary/constrain) and <https://www.merriam-webster.com/dictionary/constrain>.

8 3. Attached hereto as Exhibit B is a true and correct copy of Notes for 43 CFR  
9 Subtit. B, Ch. II, Subch. D, Group 4700. This was downloaded from Lexis.

10 4. Attached hereto as Exhibit C is a true and correct copy of 51 Fed. Reg. 7410, Mar.  
11 3. 1986.

12 5. Attached hereto as Exhibit D is a true and correct copy of 56 Fed. Reg. 786,  
13 January 9, 1991.

14 6. Attached hereto as Exhibit E is a true and correct copy of 43 C.F.R. §4700 et seq.  
15 (1985).

16 7. Attached hereto as Exhibit F is a true and correct copy of 49 Fed. Reg. 49252,  
17 Dec. 18, 1984.

18 DATED: December 13, 2024

Respectfully submitted,

20 /s/ Rae Lovko

21 J. Rae Lovko  
22 (Cal. Bar No. 208855, admitted pro hac vice)  
23 2748 Adeline Street, Suite A  
24 Berkeley, CA 94703  
25 (510) 900-9502  
26 rlovko@greenfirelaw.com